

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF PUERTO RICO**

In re:

THE FINANCIAL OVERSIGHT AND MANAGEMENT  
BOARD FOR PUERTO RICO,

as representative of

THE COMMONWEALTH OF PUERTO RICO, *et al.*,

Debtors.<sup>1</sup>

PROMESA Title III

No. 17-BK-3283-LTS

(Jointly Administered)

In re:

THE FINANCIAL OVERSIGHT AND MANAGEMENT  
BOARD FOR PUERTO RICO,

as representative of

THE PUERTO RICO ELECTRIC POWER AUTHORITY,

Debtor.

PROMESA Title III

No. 17-BK-4780-LTS

<sup>1</sup> The Debtors in these Title III Cases, along with each Debtor's respective Title III case number and the last four (4) digits of each Debtor's federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico (Bankruptcy Case No. 17-BK-3283-LTS) (Last Four Digits of Federal Tax ID: 3481); (ii) Puerto Rico Sales Tax Financing Corporation ("COFINA") (Bankruptcy Case No. 17-BK-3284-LTS) (Last Four Digits of Federal Tax ID: 8474); (iii) Puerto Rico Highways and Transportation Authority ("HTA") (Bankruptcy Case No. 17-BK-3567-LTS) (Last Four Digits of Federal Tax ID: 3808); (iv) Employees Retirement System of the Government of the Commonwealth of Puerto Rico ("ERS") (Bankruptcy Case No. 17-BK-3566-LTS) (Last Four Digits of Federal Tax ID: 9686); (v) Puerto Rico Electric Power Authority ("PREPA") (Bankruptcy Case No. 17-BK-4780-LTS) (Last Four Digits of Federal Tax ID: 3747); and (vi) Puerto Rico Public Buildings Authority ("PBA") (Bankruptcy Case No. 19-BK-5523-LTS) (Last Four Digits of Federal Tax ID: 3801) (Title III case numbers are listed as Bankruptcy Case numbers due to software limitations).

UNIÓN DE TRABAJADORES DE LA INDUSTRIA  
ELÉCTRICA Y RIEGO, INC.,

Plaintiff,

v.

PUERTO RICO ELECTRIC POWER AUTHORITY; THE  
FINANCIAL OVERSIGHT AND MANAGEMENT BOARD  
FOR PUERTO RICO, as representative of PUERTO RICO  
ELECTRIC POWER AUTHORITY; PUERTO RICO  
PUBLIC PRIVATE PARTNERSHIP AUTHORITY; and  
GENERA PR LLC

Defendants.

PROMESA Title III

Adv. Proc. No. 23-00045-LTS

**AMENDED INFORMATIVE MOTION AND NOTICE OF  
REQUEST TO BE HEARD AT THE JUNE 28, 2023 HEARING**

The Ad Hoc Group of PREPA Bondholders (“**Ad Hoc Group**”) submits this amended informative motion in response to the Court’s (i) *Order Regarding Procedures for June 28, 2023, Hearing* [Case No. 17-3283, Docket No. 24624; Case No. 17-4780; Docket No. 3779], and (ii) *Order Concerning Informative Motion of the Financial Oversight and Management Board for Puerto Rico Listing Primary Amendments to Title III Plan of Adjustment in Connection with Certification of 2023 PREPA Fiscal Plan and Joint Status Report Concerning Confirmation Proceedings* [Case No. 17-3283, Docket No. 24654; Case No. 17-4780; Docket No. 3794] (together, the “**Orders**”) setting forth guidelines for parties wishing to be heard at the June 28, 2023 hearing (the “**Hearing**”).

1. Amy Caton, Alice J. Byowitz, Matthew M. Madden, and Gary A. Orseck of Kramer Levin Naftalis & Frankel LLP will appear in person in New York on behalf of the Ad Hoc Group at the Hearing and address the following matters:

- a. *Informative Motion of Financial Oversight and Management Board for Puerto Rico Listing Primary Amendments to Title III Plan of Adjustment in Connection with Certification of 2023 PREPA Fiscal Plan* [Case No. 17-3283, Docket No. 24652; Case No. 17-4780, Docket No. 3793];
- b. Joint Status Report to be filed by the Oversight Board; and
- c. Any objections, responses, statements, joinders, or replies to any of the foregoing.

2. Ms. Caton, Ms. Byowitz, Mr. Madden, and Mr. Orseck reserve the right to be heard on any matter raised by any party at the Hearing related to the Title III cases, or any adversary proceeding pending in the Title III Cases, other interests of the Ad Hoc Group.

We hereby certify that, on this same date, we electronically filed the foregoing with the clerk of the Court using the CM/ECF system, which will notify the attorneys of record.

**RESPECTFULLY SUBMITTED,**

In San Juan, Puerto Rico, today June 26, 2023.

**TORO COLÓN MULLET P.S.C.**

P.O. Box 195383  
San Juan, PR 00919-5383  
Tel.: (787) 751-8999  
Fax: (787) 763-7760

/s/ **Manuel Fernández-Bared**

MANUEL FERNÁNDEZ-BARED  
USDC-PR No. 204,204  
E-mail: mfb@tcm.law

/s/ **Linette Figueroa-Torres**

LINETTE FIGUEROA-TORRES  
USDC-PR No. 227,104  
E-mail: lft@tcm.law

/s/ **Nayda Perez-Roman**

NAYDA PEREZ-ROMAN  
USDC-PR No. 300,208  
E-mail: nperez@tcm.law

*Counsel for the Ad Hoc Group of PREPA  
Bondholders*

**KRAMER LEVIN NAFTALIS &  
FRANKEL LLP**

1177 Avenue of the Americas  
New York, New York 10036  
Tel.: (212) 715-9100  
Fax: (212) 715-8000

/s/ **Amy Caton**

AMY CATON\*  
MATTHEW M. MADDEN\*  
ALICE J. BYOWITZ\*  
Email: acaton@kramerlevin.com  
mmadden@kramerlevin.com  
abyowitz@kramerlevin.com

*\*Admitted Pro Hac Vice*

*Counsel for the Ad Hoc Group of  
PREPA Bondholders*

**EXHIBIT A**

**EXHIBIT A**  
**PARTY APPEARANCE SHEET**

Name of Party		Ad Hoc Group of PREPA Bondholders
ATTORNEY 1	Appearance Method	In Person – New York
	Name	Amy Caton
	Law Firm	Kramer Levin Naftalis & Frankel LLP
	Email	acaton@kramerlevin.com
	Phone Number	(212) 715-7772
	Docket Entry No. of Notice of Appearance	73
ATTORNEY 2	Appearance Method	In Person – New York
	Name	Alice J. Byowitz
	Law Firm	Kramer Levin Naftalis & Frankel LLP
	Email	abyowitz@kramerlevin.com
	Phone Number	(212) 715-9201
	Docket Entry No. of Notice of Appearance	73
ATTORNEY 3	Appearance Method	In Person – New York
	Name	Matthew M. Madden
	Law Firm	Kramer Levin Naftalis & Frankel LLP
	Email	mmadden@kramerlevin.com
	Phone Number	(202) 775-4529
	Docket Entry No. of Notice of Appearance	73
ATTORNEY 4	Appearance Method	In Person – New York
	Name	Gary A. Orseck
	Law Firm	Kramer Levin Naftalis & Frankel LLP
	Email	gorseck@kramerlevin.com
	Phone Number	(202) 775-4504
	Docket Entry No. of Notice of Appearance	73